14 - 1

Page 1

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

United States of America, Plaintiff,

vs.

Criminal No. 05-40026-FDS

Muhamed Mubayyid, Emadeddin Z.)
Muntasser, and Samir Al-Monla,)
a/k/a Samir Almonla,
Defendants.

BEFORE: The Honorable F. Dennis Saylor, IV

Jury Trial Day 14

United States District Court Courtroom No. 22 One Courthouse Way Boston, Massachusetts December 4, 2007

Marianne Kusa-Ryll, RDR, CRR
Official Court Reporter
Kimberly A. Smith, RDR, CRR
United States District Court
595 Main Street, Room 514A
Worcester, MA 01608-2093
Mechanical Steno - Transcript by Computer

b3b14a38-cb9e-4803-8011-c0509b2d6754

## 14-118

## Q. Excuse me.

- A. Go ahead.
- 3 O. You had 20 million documents in this database; is that
- 4 right?
- A. That was an estimation that I gave. I didn't actually say
- I had 20 million documents. What I said is that if you took
- the amount of data that's on my drive and if you tried to
- figure that out in terms of how many printed pages it would be
- it would be something like 20 million documents. However, the 9
- 10 fact is that a number of files that I have on my database are
- 11 larger than others. Some are video files. Some are audio
- 12 files. I think the best way to say it is that the data
- 13 consists of several million documents from all different
- 14 sources which are, again, sorted by various different subject
- 15 areas.
- 16 Q. Thank you. So it's several million documents?
- 17 A. I would say that would be . . .
- 18 Q. And obviously you have not read each one?
- 19 A. No.
- 20 Q. Now, you published one book; is that right?
- 21 A. That's correct.
- 22 Q. And you've described that book as being about foreign
- 23 fighters who fought in Afghanistan and later in Bosnia and
- 24 other places?
- 25 A. It's primarily about the phase of their fighting in

## Page 120 Page 118

- Q. And you were aware that Berg describes itself -- and I quote -- as an international independent publisher committed t
- 3 innovative ideas in visual and material culture, including
- fashion and textiles, cultural media studies, film, art and
- design, food, sport, and anthropology. Is that how web -- how 5
- 6 Berg describes itself on its website?
- 7 A. I would say yes.
- Q. And you also submitted the manuscript for this book to 8
- Penn University Press and Yale University Press; is that right?
- 10 A. Among others, yes.
- 11 Q. Yes. Among others. And they did not accept it; is that
- 12 fair to say?
- 13 A. No, they didn't.
- 14 Q. Now, you haven't published any other books besides this?
- 15 A. Not yet, no.
- 16 Q. And the book that you published, it's not a history of the
- 17 events in Bosnia in the 1990s, is it?
- 18 A. It's a history of the events of the mujahideen in Bosnia.
- 19 It's not a history of the general war per se.
- 20 Q. And nor is it a history of the events in Afghanistan in
- 21 the 1990s and 1980s?
- 22 A. Again, it's based upon Kataeb al-Mujahideen, which is
- 23 mujahideen organization. It's not the history of individual
- 24 conflicts overall.
- 25 Q. Now, you discussed at some length the history of

## Page 119

- Bosnia-Herzegovina, but it does trace their origins from
- Afghanistan and then traces what they did afterwards as well.
- Q. And you call these people the Afghan -- Arab-Afghans? 3
- A. This is a common term used by not just myself --
- 5 MS. LUNT: Your Honor, may he be instructed to answer
- 6 my question?
- 7 THE COURT: And the question is whether you refer to
- them as Arab-Afghan.
- 9 A. I do, yes.
- Q. And this book is based in part on your undergraduate work; 10 yes --
- 11 is that right?
- 12 A. It was based on a lot of things, but it was based
- 13 partially upon the thesis that I wrote at the end of my
- 14 undergraduate. It was based partially on the research that I
- 15 had done in the Investigative Project. It was based partially
- 16 upon research I had done on my own. It was based upon a lot of 6 A. Yes.
- 17 different things. The process of writing this book took almost
- 18 two and a half years.
- 19 Q. And this book was published, was it not, by Berg Press?
- 20 A. That's correct.
- Q. And you have described Berg Press in earlier testimony as
- 22 a, quote, academic publisher?
- 23 A. That's correct.
- 24 Q. Now, it's not a university press, is it?
- 25 A. No.

- 1 Afghanistan from 1979 to the Taliban taking over in 1996;
- is that correct?
- 3 A. Yes, approximately.
- Q. Now, as you said, you've never been to Afghanistan or
- 5 Pakistan?
- 6 A. No.
- 7 Q. And you haven't pursued graduate level courses -- studies
- 8 in history, have you?
- 9 A. I have taken graduate level courses in Afghan history,
- 11 Q. You took a course --
- 12 A. -- but I have not pursued a full length of study focused
- 13 on graduate history, no.
- 14 Q. And you would agree with me, would you not, that there was
- 15 a colossal humanitarian crisis in Afghanistan in the 1990s?
- 17 Q. And there were at least four and a half million Afghani
- 18 refugees in Pakistan?
- 19 A. Okay. Probably, yes. That sounds about right.
- 20 Q. And another two million in Iran?
- 21 A. That's correct.
- 22 Q. And then there were many internally displaced people
- 23 within Afghanistan?
- 24 A. Oh, yes.
- 25 Q. And the term of art for those people is IDPs, right?

31 (Pages 118 to 121)

Page 121